

LOVELLS LLP  
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UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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In re:  
  
LEHMAN BROTHERS HOLDING INC., et. al.,  
  
Debtors.  
  
: Chapter 11  
:  
: Case No. 08-13555 (jmp)  
:  
: (Jointly Administered)  
:  
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**SECOND AMENDED VERIFIED STATEMENT OF LOVELLS LLP  
PURSUANT TO FEDERAL RULE OF BANKRUPTCY PROCEDURE 2019**

Lovells LLP ("Lovells") as attorneys for the entities listed on Exhibit A hereto (collectively, the "Entities"), in connection with the above-captioned chapter 11 cases of Lehman Brothers Holdings Inc., and its debtor affiliates (collectively, the "Debtors"), makes this Second Amended Statement pursuant to Rule 2019 of the Federal Rules of Bankruptcy Procedure:

1. Lovells has been retained by the Entities in connection with the Debtors' cases.
2. Each of the Entities holds claims against and/or interests in various Debtors arising at various times pursuant to agreements with the Debtors, and/or under statutory and/or common law and/or at equity. The Entities may also hold additional claims against and/or interests in the Debtors that do not fall within the scope of Lovells' representation of such Entities.
3. The specific nature and amounts of the claims held by the Entities have been set forth in proofs of claim filed against the relevant Debtors' estates.
4. The following are the facts and circumstances in connection with Lovells' employment in these cases. Lovells represented certain of the Entities or their affiliates in

matters unrelated to Lehman prior to the commencement of the Debtors' chapter 11 cases and each of the Entities separately requested that Lovells represent them in connection with issues and claims generated by the filing of the Debtors' chapter 11 cases.

5. Lovells also represents or advises, or may have represented or advised, other parties in interest with respect to these cases that have not been included in this Statement because such parties have not instructed Lovells to appear in these cases on their behalf. These parties in interest may include commercial and investment banks, hedge funds, and other financial institutions and parties to various agreements with the Debtors.

6. In the past, Lovells provided certain legal services to certain of the Debtors or their affiliates. In this respect, Lovells has filed claims against Lehman Brothers Holdings, Inc. In addition, Lovells may at some future time seek to have its fees and disbursements paid by the Debtors' estate pursuant to the Bankruptcy Code. Upon information and belief, Lovells does not hold any equity interest in the Debtors.

7. Lovells reserves the right to supplement or amend this Statement in the future.

8. The undersigned declares under penalty of perjury that the statements made herein are true and accurate, to the best of his knowledge, information and belief.

Dated: New York, New York  
January 08, 2010

By: /s/ Matthew P. Morris  
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**EXHIBIT A**

| <b><u>Creditor</u></b>   | <b><u>Address</u></b>   |
|--|---|
| Standard Chartered Bank  | 1 Madison Avenue, 3rd Floor<br>New York, NY 10010             |
| Lloyds TSB Bank plc  | 1251 Avenue of the Americas, 39th Floor<br>New York, NY 10020 |
| QVT Financial, LP  | 1177 Avenue of the Americas<br>New York, NY 10036             |
| BRE Bank S.A.  | ul. Senatorska 18<br>00-950 Warszawa, P.O. Box 728            |
| MP Bank hf   | Skipholt 50d<br>105 Reykjavik, Iceland                        |
| VBS Investment Bank  | Borgartun 26, 6th Floor<br>105 Reykjavik, Iceland             |
| SABMiller plc  | One Stanhope Gate<br>London W1K 1AF, United Kingdom           |
| The Seaport Group LLC  | 360 Madison Avenue<br>New York, NY 10017                      |
| Ente Nazionale di Previdenza ed Assistenza per gli Psicologi   | Via Andrea Cesalpino, 1<br>00161 Roma<br>Italy                |
| Ente di Previdenza e Assistenza Pluricategoriale               | Via Vicenza, 7<br>00185 Roma<br>Italy                         |
| Fondo Pensioni per il Personale del Creditor, Fondiario S.p.A. | VIA Cristoforo Colombo, 80<br>00147 Roma<br>Italy             |
| KM Immobilienservice GmbH                                      | Erlersstrasse 7<br>6020 Innsbruck<br>Austria                  |
| Deka FundMaster Investmentgesellschaft MbH                     | Hahnstrasse 55<br>60528 Frankfurt<br>Germany                  |
| Centerbridge Credit Partners Master, L.P.                      | 375 Park Avenue<br>New York, NY 10152                         |

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| Centerbridge Special Credit Partners<br>L.P.  | 375 Park Avenue<br>New York, NY 10152                             |
| International Fund Management, S.A.           | 3, rue des Labours<br>1912 Luxembourg<br>Luxembourg               |
| Banco Pastor                                  | Cantón Pequeño nº1, 6ª Planta<br>15003 - A CORUÑA                 |
| Tegean Master Fund LTD                        | 140 East 45th Street<br>New York, NY 10017                        |
| Martin Currie China 'A' Share Fund<br>Limited | Washington Mall I<br>22 Church Street<br>Hamilton HM11<br>Bermuda |
| Phoenix Life Limited                          | 1 Wythall Green Way<br>Wythall, Birmingham B47 6WG                |
| The Bank of New York Mellon                   | 6525 West Campus Oval<br>New Albany, Ohio 43054                   |